

REMARKS

1. Summary of Office Action

In the Office Action mailed June 3, 2005, the Examiner rejected claims 1-5 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,345,053 (Jeon) in view of U.S. Patent No. 6,442,384 (Shah et al.).

2. Amendments and Pending Claims

Applicant has amended claims 1, 2, and 4-5, and has added new claims 6-10. Now pending in this application are claims 1-10, of which claim 1 is independent.

Applicant has amended the specification by amending the paragraph starting on page 8, line 2. Support for this amendment is shown in Figure 6.

3. Overview of Jeon

Jeon is directed to a method of generating program loaded data (PLD) for a communication system such as a CDMA or PCS system. Generating the PLD includes the steps of: (i) classifying data with a PLD relation identifier, (ii) generating an initial default data file for generating standard PLD, (iii) creating a key dictionary and an attribute dictionary file, (iv) writing PLD header information and relation dictionary information into a PLD initial data file, (v) creating a list data file having information about the data file needed by each system, and (vi) generating the PLD by using the data files created in the above steps. (*See e.g.*, Col. 3, lines 31-44).

4. Response to §103 Rejections

The Examiner indicated that claims 1-5 are rejected under 35 U.S.C. §103(a) as being unpatentable over Jeon in view of Shah et al. Applicant respectfully traverses the rejection of

claims 1-5 because the combination of Jeon and Shah et al. fail to disclose or suggest the combination of elements recited in any of these claims.

Claim 1 was amended to clarify that the group IDs allocated to each of the plurality of BSCs are **BSC group IDs**. With respect to amended and independent claim 1, Jeon and Shah et al., alone or in combination, do not teach or suggest (i) BSC group IDs, or (ii) allocating corresponding **specific BSC identities (IDs) and** corresponding **BSC group IDs** to each of the plurality of BSCs, or (iii) recognizing a corresponding **specific BSC ID and** a corresponding **BSC group ID** allocated to each BSC by analyzing the BSC ID allocation data. (Emphasis added).

In rejecting claim 1, the Examiner indicated that Jeon, at Col. 4, lines 3-15, and lines 29-34, discloses assigning base station controller identities (BSC_ID) with relation identifier (REL_ID). The Examiner considered the relation identifier (REL_ID) to be a “group ID.” However, claim 1 has been amended to specify that the “group ID” is a “**BSC group ID**.” In contrast, the relation identifier (REL_ID) classifies data files. (See, e.g., Col. 4, lines 31-33, and Col. 7, lines 29-31). As such, a relation identifier (REL_ID) is not a “**BSC group ID**.”

Moreover, the BSC_ID that Jeon discusses at Col. 4, lines 3-15, is an ID for **data for hardware configuration associated with a BSC**. However, Jeon does not teach or suggest that the BSC_ID (i.e., the ID for **data for hardware configuration associated with a BSC**) or any other ID is a **specific BSC ID** for each of a plurality of BSC. For this reason, and because Jeon does not teach or suggest a “**BSC group ID**” or “**BSC group IDs**,” Jeon does not teach or suggest (i) allocating corresponding **specific BSC identities (IDs) and** corresponding **BSC group IDs** to each of the plurality of BSCs, or (ii) recognizing a corresponding **specific BSC ID and** a corresponding **BSC group ID** allocated to each BSC by analyzing the BSC ID allocation data.

Further, with respect to claim 1, Shah et al. fails to make up for the deficiencies of Jeon. According to the Examiner, Shah et al. discloses a telecommunication network in which an OMC is connected to a base station subsystem (BSS) that comprises a BSC and a BTS, wherein information is transmitted between the OMC and the BSS. However, Applicant submits that Shah et al., alone or in combination with Jeon, does not disclose or suggest (i) **BSC group IDs**, or (ii) allocating corresponding **specific BSC identities (IDs) and** corresponding **BSC group IDs** to each of the plurality of BSCs, or (iii) recognizing a corresponding **specific BSC ID and a** corresponding **BSC group ID** allocated to each BSC by analyzing the BSC ID allocation data.

For these and potentially other reasons, claim 1 is allowable over Jeon and Shah et al. Moreover, claims 2-10 depend from claim 1 and are also allowable over Jeon and Shah et al. for at least the reason that they are dependent upon an allowable claim.

5. Conclusion

In view of the above amendments and remarks, Applicant respectfully submits that claims 1-10 are now in a condition for allowance, and respectfully requests favorable reconsideration and allowance of the claims. If the Examiner would like to discuss this case, the Examiner is encouraged to contact the undersigned at (312) 913-3313.

Respectfully submitted,

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